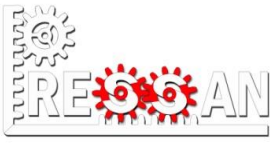


PRESSAN MADENİ EŞYA SAN. ve TİC. A.Ş.

SUSTAINABILITY PRINCIPLES

This regulation has been prepared to ensure that all our employees adopt our business ethics values that have been ongoing since the establishment of our company and to ensure their continuity. The explanations in this regulation determine the behaviors expected from all PRESSAN A.Ş. employees and provide guidance on how to implement them. This regulation applies to every employee within PRESSAN A.Ş., regardless of their position, location and position.



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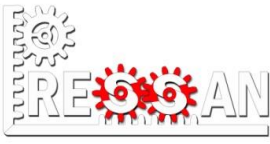


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Our expectations

1. HONESTY

As PRESSAN A.Ş., we provide all kinds of support to all relevant parties, including our employees, to comply with the values of business integrity.

Business integrity is defined as the real ethical business behavior and the impression of ethical behavior that is consistent with our commitment to conduct our business in line with this regulation.

Business integrity means, first and foremost, complying with all applicable laws and regulations, as well as complying with the high standards of integrity set by PRESSAN A.Ş.

Compliance with these standards is both the right thing to do and a prerequisite for the sustainable success of our company.

Compliance with our high standards of integrity may lead to loss of business in some cases. However, we are sure that acting honestly provides us with a commercial advantage.

Each of our employees contributes to the integrity of our company with their own behavior.

The regulations / provisions and conditions that determine appropriate behavior in commercial transactions should be evaluated separately for each case and the factors related to each case should be taken into account.

Since legal standards change over time, business behaviors must undergo a continuous evaluation.

PRESSAN A.Ş. provides all employees with the appropriate information, instructions, guidance and support required to comply with business integrity values.

Our expectations from our employees

- We must comply with all applicable laws and regulations and the integrity standards determined by PRESSAN A.Ş.
- We must evaluate each case separately whether our behaviors in our work comply with PRESSAN A.Ş.'s expectations and business integrity standards.
- We must not forget that the integrity of our company depends on our behaviors.

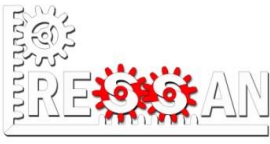
2. GIVING AND RECEIVING GIFTS

We do not accept or offer gifts or entertainment that may raise concerns about our personal integrity.

When giving and accepting gifts, and when hosting or attending entertainment, we must ensure that doing so does not distort our business relationships, create a conflict of interest, or be construed as a bribe.

These concepts include personal gifts, gift certificates, discounts or cash, event tickets, travel, restaurant meals, hotel stays, and offers of employment or contracts for friends or relatives. Giving and receiving gifts and hosting or attending entertainment can help establish goodwill in a business relationship, but it can also make it difficult to remain objective toward the person or company we are dealing with. Gifts and exchanges are acceptable business practices as long as they remain within reasonable limits, but they can also create a conflict of interest.

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A conflict of interest can also occur when favors or special treatments that do not have a financial value attached to them are given and received. These special treatments often create an expectation of “reciprocity” and can damage a business relationship.

Certain types of gifts and entertainment are reasonable – given their low value and nature – and are permissible without prior approval, provided there is a valid business reason.

Usually, gifts of high value should be politely declined or returned. However, in cases where it would be inappropriate to do so (for example, if the return would cause serious offence), the gift in question may be considered a gift to PRESSAN A.Ş. rather than to you. In such cases, the relevant gifts are recorded in the company’s records.

Our expectations from our employees

- We must always obtain approval from senior management for all gifts and entertainment, regardless of value, given to or received from customer employees or government officials.
- We must have a valid business reason for every gift and entertainment.

The following are generally acceptable without approval:

- Dinners with business partners, customers or suppliers, regular sports, theater or other cultural events provided there is a valid business reason,
- Promotional items of small value such as fountain pens, calendars, key chains and entertainment events provided they are given to suppliers and customers in general.

3. BRIBERY AND CORRUPTION

We do not tolerate bribery or corruption in any form.

Compliance with laws regarding bribery and corruption is mandatory. We must never offer, give or accept any gift, payment or other benefit for the purpose of creating an improper advantage for PRESSAN A.Ş.

Many countries have laws that make it illegal to engage in bribery and corruption.

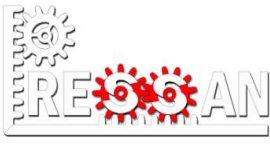
An increasing number of countries are criminalizing and investigating bribery activities that occur outside their borders. Violating these laws is a serious criminal offense for the individuals and companies involved. Penalties typically include imprisonment, large sums of money (for both companies and individuals) and significant damage to the company’s reputation.

Companies may be required to self-report these violations to law enforcement authorities through their employees.

The main corruption crimes are:

- Offering a bribe
- Giving a bribe
- Asking for or accepting a bribe

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The definition of bribery includes money, services, gifts, excessive or unjustified entertainment and other similar benefits (including providing support, favoritism). Giving, offering or accepting any of these may constitute bribery if the purpose is to secure business or win business or to provide any improper advantage in any way.

A bribe does not necessarily have to consist of large sums of money. Small payments to government officials or representatives of official authorities are often referred to as facilitation payments and can be made directly or indirectly, including through a third party. Those who receive bribes may include customers, suppliers, government officials and officials, and political representatives, as well as their families and friends.

Our expectations from our employees

- Persons and organizations, consultants or representatives working on behalf of PRESSAN A.Ş. should never be involved in such corrupt behavior.
- We should bring a potential bribe payment request made by a third party to the attention of our line manager.
- We should comply with the special rules applicable to officials and consultants.
- We should identify potential situations indicating a corruption risk.

4.CONFIDENTIALITY OF DATA AND PROTECTION OF PERSONAL DATA

We take care to protect the personal data of our employees and related parties.

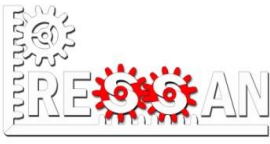
PRESSAN A.Ş. takes care to protect the personal data of its employees and all stakeholders. In this context, all personnel personal information and all e-mail correspondence made on behalf of the company are kept by the information processing unit.

E-mail is an important internal and external communication method. E-mails are records that can only be disclosed if legal processes require it and must otherwise be kept strictly confidential.

Except for those allocated for common use, the responsibility for the security of personal computers belongs to the employee.

All kinds of electronic media and communication systems such as voice mail, e-mail, commercial software and internet service accessed through Microsoft Internet Explorer or any other internet service provider are the property of PRESSAN A.Ş. Communications made on these systems are not private communications but business records that can be monitored by PRESSAN A.Ş. or referred to in the event of a legal lawsuit, and there should be no privacy expectation regarding communications sent through these systems and no sharing/storage of personal data that exceeds the scope required by the job.

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In these systems, any threatening, abusive, defamatory, slanderous, obscene or obscene material that constitutes a crime, requires legal action or otherwise violates the law, knowingly, carelessly or with bad intentions, is sent or stored, PRESSAN A.Ş.'s policies on sexual harassment and discrimination are valid for e-mail and other electronic media used by the employee.

Information regarding the medical history of employees is collected by PRESSAN A.Ş. and is encrypted or stored under lock and key in a way that can be accessed by the workplace physician or only by specially authorized persons. Such information is within the scope of special personal data and its security is under the responsibility of PRESSAN A.Ş. Personal printed health information is given to the employee personally or, upon the employee's written request, is printed using protected printing tools in a way that it cannot be seen by a third party.

Wages / salaries / additional income and similar personnel information specific to individuals reflecting the company's policy are confidential and are not disclosed to anyone other than authorized persons. It is prohibited for personnel to disclose these to others or to pressure other employees to disclose this information.

Personal data must be processed by PRESSAN A.Ş. employees in accordance with Law No. 6698 and other relevant legislation; PRESSAN A.Ş. Personal Data Protection Policy and other relevant PRESSAN A.Ş. policies and procedures.

Our expectations from our employees

- You are responsible for protecting the security of the address assigned to you for e-mail use,
- You should never allow anyone else to use your e-mail,
- You are responsible for the individual use and security of the user logins assigned to you for information processing software developed by PRESSAN A.Ş.,
- You should not allow anyone else to enter the systems entered with your user password using the same user name and password,
- Please remember that you should use the PRESSAN A.Ş. computers assigned to you for business purposes.

5.CONFLICT OF INTERESTS

We do not allow personal interests to negatively influence our business decisions.

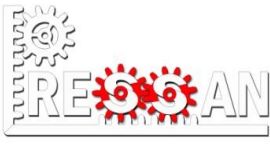
A conflict of interest exists when an employee's personal interests conflict with the interests of PRESSAN A.Ş. and when their loyalties are divided.

The activities of our relatives and close relatives may cause conflicts of interest.

Even professional connections outside of PRESSAN A.Ş., including being a board member of third parties, may result in conflicts of interest.

Many actual or potential conflicts of interest can be resolved in a manner acceptable to both the person concerned and the company.

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Our expectations from our employees

- As all PRESSAN A.Ş. employees, we must avoid situations where our personal interests conflict with, or even give the impression that they conflict with, the interests of PRESSAN A.Ş.
- We must not play a role in any decision that would create a conflict between the interests of PRESSAN A.Ş. and our own personal interests, nor should we appear to play a role or influence the decision.
- We should not use our position at PRESSAN A.Ş. inappropriately for our own benefit or the benefit of our relatives or close ones.
- We should carefully consider the potential conflicts of interest that may arise before accepting a second job.
- PRESSAN A.Ş. employees cannot accept membership in any third-party company, commercial entity or scientific advisory board without the approval of their senior management. However, prior approval is not required for membership in the boards of charitable, non-profit and non-commercial organizations (sports clubs, charity societies).
- Any questions regarding conflicts of interest or special circumstances should be directed to the Human Resources Department.

6. INSIDER INFORMATION & TRADING

Employees may obtain information that is not publicly known during their employment at PRESSAN A.Ş.

This may include information regarding product developments, new projects, financial information, forecasts, business plans and strategies, and other types of basic information that are not known to persons outside of PRESSAN A.Ş.

Our expectations from our employees

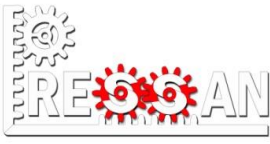
- We must not disclose information classified as confidential to any person outside of PRESSAN A.Ş., except to those authorized by PRESSAN A.Ş.

We must only share confidential information with those who need to know it and have the right to receive it.

We must be aware of the competitive intelligence activities of third parties that may harm the assets and interests of PRESSAN A.Ş.

We must respect our confidentiality obligations under this contract, even after our employment contract has ended.

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7. INTELLECTUAL PROPERTY RIGHTS

The protection of all intellectual property rights belonging to our company and related parties is part of our business ethics.

PRESSAN A.Ş. expects its employees to take into account the intellectual property rights of third parties with due care in their daily work.

Intellectual property laws protect valuable PRESSAN A.Ş. assets (such as our patents, trademarks, data we submit to regulatory authorities, copyrights, trade secrets, domain names and related rights).

PRESSAN A.Ş. supports initiatives that foster a legal and regulatory environment that protects intellectual property rights.

PRESSAN A.Ş. is committed to respecting the intellectual property rights of third parties.

When our company's intellectual property rights are violated, PRESSAN A.Ş. rights are defended by our lawyers.

Our expectations from our employees

- We must protect PRESSAN A.Ş.'s intellectual property rights and respect the intellectual property rights of others.
- We must report all products that we suspect of infringing PRESSAN A.Ş.'s intellectual property rights, including "imitation" products and suspected counterfeits.
- We must enter into written agreements to ensure that all materials created by PRESSAN A.Ş. or created on our behalf are owned by the intellectual property rights.
- Whenever there are doubts regarding intellectual property rights, we must ask our firm lawyers to clarify the situation.

8. SAFETY & ENVIRONMENT

We take all reasonable and practical measures to provide a safe, secure, healthy and clean working environment.

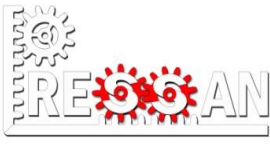
As PRESSAN A.Ş., we believe that occupational accidents and occupational diseases can be prevented.

The aim of our ongoing work on occupational health and safety is to have zero frequency of these incidents. We also encourage the safety of our employees outside the workplace.

In line with our commitment to sustainable development, we look for new, more sustainable technologies and processes in the future in order to minimize our impact on the environment.

We take all reasonable and practical measures to provide a safe, secure, healthy and clean working environment.

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Our expectations from our employees

- It is the duty of every employee to comply with the occupational safety and environmental rules determined by PRESSAN A.Ş.
- We all have duties to reduce the impacts of our activities on the environment.
- Changing our own behaviors to reduce the impact we create on the environment by reducing the amount of waste and saving water and energy are the behaviors we expect from our employees.

Corporate Responsibilities

1. HUMAN RIGHTS

We are committed to preventing human rights violations in the course of our business activities.

We must protect human rights, promote their implementation and ensure that we do not directly or indirectly contribute to the abuse of human rights.

We must work to eliminate all forms of human rights abuses that may exist in the labour market, especially those that are in any way connected to our business or supply chain.

Success will be achieved by respecting each other, valuing the contributions of each of our colleagues and treating everyone fairly.

2. FORCED OR COMPULSORY LABOUR

We do not permit any form of forced or compulsory labor.

The term “Compulsory or Forced Labor” refers to any work or service to which any person is forced under threat of punishment and against the full will of that person.

All forms of forced or compulsory labor are strictly prohibited.

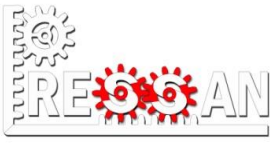
The provisions of the applicable laws and relevant international agreements on this matter shall prevail.

3. CHILD LABOUR

We do not employ workers who have not completed compulsory education age and are younger than 18 years of age in our company.

Our practices in this regard are based on the provisions of the applicable law and relevant international agreements.

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4. WORKING HOURS

We do not employ our employees outside of the conditions set by law.

Total orking hours (Esenyurt):

Weekly: 45 hours Monthly : 225 hours

Shifts:

Monday-Saturday : 07:00-15:00 / 15:00-23:00 / 23:00-07:00

Office Working hours:

Monday-Friday : 07:00-17:00

Total orking hours (Kocaeli):

Weekly: 45 hours Monthly : 225 hours

Shifts:

Monday-Saturday : 07:00-15:00 / 15:00-23:00 / 23:00-07:00

Office Working hours:

Monday-Friday : 07:00-17:00

5. WAGES & BENEFITS

We provide compensation and social assistance to our employees in accordance with the law.

Employees are given social rights and overtime payments are made in accordance with the applicable laws.

Deductions regarding taxes, social rights, etc. are communicated to employees in detail.

Wages are deposited into the bank regularly for each employee.

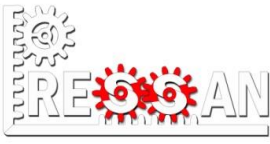
6. NON-DISCRIMINATION, THE RIGHTS OF MINORITIES AND INDIGENOUS PEOPLE

We provide our employees with a fair, respectful work environment free from any harassment, discrimination or other degrading behavior.

PRESSAN A.Ş. values each employee and their contributions; its commitment to providing equal opportunities and not tolerating discrimination is clear and definite.

We are determined to maintain a fair work environment where diversity and different ideas are valued, free from any kind of discrimination based on personal characteristics such as gender, race, ethnicity, color, religion, age, nationality, culture, lineage, citizenship, sexual orientation, gender identity or expression, disability, veteran status.

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We do not tolerate any form of discrimination or harassment in the workplace. We are also responsible for fulfilling our commitment to provide a work environment that offers equal conditions, where job positions are filled with the most suitable candidates and everyone is rewarded fairly and based on the skills, attitudes, abilities, experience, qualifications and performances they possess and/or demonstrate.

7. DIVERSITY, EQUITY & INCLUSION

Diversity, equality and inclusiveness are part of our business culture.

As PRESSAN A.Ş., we do not request information about candidates' language, race, color, sect, age, gender, culture, nationality, ethnicity, disability, political and religious beliefs, sexual orientation, military service, pregnancy status, marital status for the purpose of recruitment evaluation during recruitment, assignment/promotion and development processes.

We encourage diversity of ideas, create communication channels where employees can express their opinions and suggestions, and support participation.

PRESSAN A.Ş. supports women's employment in business life and women employees' participation in management. We encourage diversity in teams in terms of age, gender, culture, etc.

We offer fair and equal opportunities to all employees, candidates and business partners. PRESSAN A.Ş. provides equal pay for equal work for women and men.

8. FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING

We respect the freedom of voluntary association, including the right of our employees to organize and bargain collectively in accordance with the law.

We respect the freedom of voluntary association, including the right to organize and bargain collectively in accordance with the law.

Worker representatives are not subject to any discrimination and have the legal right to perform their functions.

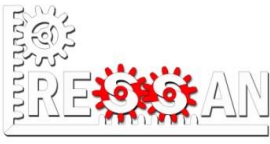
9. COUNTERFEIT PARTS

We take counterfeit parts very seriously and we work to prevent them from making their way into the customer and marketplace.

Counterfeit car parts can result in vehicle damage and jeopardize the safety of passengers. Fake car parts aren't limited to in-dow regulators or latches, but can also include detail parts that are assembled into them.

We control the materials and our supplier's parts by incoming control and certificate check. If required, we can also check the parts by independent laboratories.

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10. ENERGY POLICY

PRESSAN aims to implement and develop a proactive energy management system based on sustainable development in all its activities.

In this direction,

- Efficient use of energy and natural resources in all its activities
- Implementing environmentally and energy friendly technologies in new projects and equipment purchases
- To save energy and reduce the consumption of natural resources by making efficiency-enhancing improvements in existing processes and systems
- Continuous improvement of energy performance through the design and supply of products, processes & services with high energy efficiency
- Ensuring that adequate resources (knowledge, expertise and economic resources) are provided and continuously reviewed to achieve energy-related goals and objectives
- Ensuring compliance with legal and other requirements regarding energy efficiency, use and consumption
- It is committed to raising the awareness of all stakeholders on renewable energy and climate change and to continuously improve the energy management system by developing energy efficiency projects that will support the principle of sustainable development.

11. DECARBONISATION POLICY

We are committed to reducing energy use, greenhouse gas and waste emissions, as well as the reliance on renewable resources and responsible management of chemicals.

We measure and monitor our efforts to reduce our carbon footprint for reduction of the release of GHG emissions from human activities to the atmosphere.

We intend to achieve carbon neutrality by 2050.

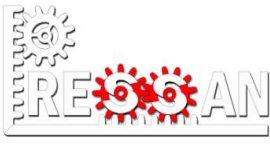
12. DISCLOSURE OF INFORMATION POLICY

As PRESSAN A.Ş. we share our financial information and targets with our shareholders every year. Our monthly customer performance is shared electronically and as a printout for all our employees to see. For requests other than these shares, the sharing decision is made by evaluating in terms of compliance with the law.

The purpose of the Company Disclosure Policy is to ensure active and transparent communication that is complete, fair, accurate, timely, comprehensible, affordable and equally accessible by all stakeholders, including the shareholders, employees and customers, in compliance with the governing regulations.

However, the Company may refrain from the public disclosure of certain information within the scope of trade secrets, design and confidential information, the disclosure of which may damage its legitimate interests, as per these regulations and under the principles set forth in the legislation.

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13. FAIR COMPETATION and ANTI-TRUST POLICY

As PRESSAN A.Ş. we are committed to conducting its business in compliance with all applicable antitrust laws and regulations, promoting fair competition in all our activities. This Fair Competition and Anti-Trust Policy aims to ensure that our company, employees, and business partners operate ethically and legally in all markets in which we compete, and to prevent any conduct that may harm competition or violate antitrust laws. This policy applies to all employees, contractors, and business partners of Pressan A.Ş. worldwide, across all business units, departments, and jurisdictions.

Pressan A.Ş. promotes an environment of fair and open competition. We do not engage in practices that would restrict or distort competition, and we are committed to ensuring that our business practices are free from anti-competitive conduct, such as price fixing, market allocation, or monopolistic behavior and complies with all applicable antitrust laws and any other national, regional, or local laws governing competition and trade. We also respect international competition laws when operating globally.

Price fixing, market allocation, bid rigging, exclusive dealing, monopolization, tying arrangements conducts are strictly prohibited under this policy and applicable antitrust laws.

We do not engage in any deceptive, fraudulent, or misleading business practices, such as misrepresenting products or services, creating false advertising, or manipulating market information to harm competitors.

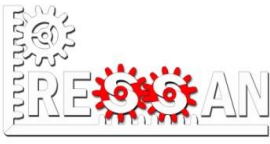
14. WHISTLEBLOWING and PROTECTION AGAINST RETALIATION POLICY

As Pressan we are committed to maintaining the highest ethical standards and ensuring a workplace free from misconduct. We encourage all employees, contractors, and stakeholders to speak up if they observe or suspect any illegal, unethical, or improper conduct.

Whistleblowing and Protection Against Retaliation Policy outlines the procedures for reporting such concerns and safeguards against retaliation for those who make legitimate reports in good faith. This policy applies to all employees, contractors, officers, directors, and other individuals associated with Pressan A.Ş., including third-party vendors and business partners. Pressan A.Ş. encourages and supports whistleblowing by providing a safe and confidential process for reporting concerns.

We are committed to investigating all legitimate reports and addressing them appropriately. Retaliation against any employee or individual who raises a concern in good faith is strictly prohibited and will not be tolerated.

PREPARED BY	CONTROLLED BY
ELİF BİLİR HUMAN RESOURCES MNG.	SERKAN TEKDAŞ MANAGEMENT SYSTEMS REPRESENTATIVE



SUSTAINABILITY PRINCIPLES

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REV. DATE : 21.10.2024

Sustainability Principles

When you encounter situations that do not comply with our social responsibilities and behavioral expectations, you can make a written report at

<http://www.pressan.com.tr/tr/Politika.aspx>

Your reports will be evaluated by the Ethics Committee and necessary measures will be taken.

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